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Attorney for Plaintiff

MONTANA FIRST JUDICIAL DISTRICT COURT, LEWIS AND CLARK COUNTY

FILED

MAY 23 2018

ANGIE SPARKS, Clerk of District Court
By *[Signature]* Deputy Clerk

**INDEXED
FILED**

JUL 09 2018

Clerk, U.S. District Court
District Of Montana
Helena

JAMES WAYNE LITTLE,

Plaintiff

v.

ALLSTATE FIRE AND CASUALTY
INSURANCE, an Insurance Corporation

Defendant.

Cause No.

COMPLAINT AND DEMAND

FOR JURY TRIAL

JAMES P. REYNOLDS
Presiding Judge

Plaintiff for his Complaint against Defendant alleges the following:

I

All acts and omissions occurred within Lewis and Clark County, State of Montana.

II

On July 26, 2015 Plaintiff was in an automobile crash and was then insured by Defendant, a licensed insurance carrier, which sold Plaintiff an insurance policy which contained underinsurance coverage. That policy number was 976291762.

III

Plaintiff sustained serious bodily injuries in the crash. Consequently he also incurred medical bills and will incur future medical bills, damage to his earning capacity, physical and emotional injuries and damage to his life and lifestyle.

IV

Plaintiff resolved his claims against the driver who was solely negligent and caused the crash on 7/26/15. That driver had inadequate insurance to cover all of the damages suffered by Plaintiff and thus Plaintiff tendered his request to Defendant to pay his underinsured damages pursuant the insurance contract that he had with Defendant.

V

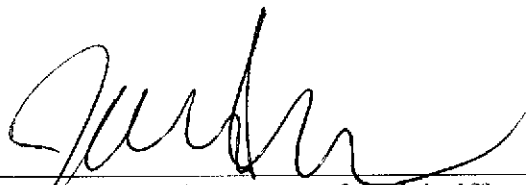
Plaintiff has made demand upon the Defendant, Plaintiff's own insurer, for payment of a fair and reasonable amount which would be his policy limits for the injuries and damages he has suffered in this car accident but such request has been refused.

Wherefore, Plaintiff prays for such damages including his contractual damages and attorney's fees and costs for the breach and failure of the Defendant to honor his contract of insurance.

DEMAND FOR JURY TRIAL

The Plaintiffs demand trial by jury on all issues in this case.

Dated this 23rd day of May, 2018.



John C. Doubek, Attorney for Plaintiff
DOUBEK PYFER & FOX, PC